

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FREEPLAY MUSIC, LLC,

Plaintiff,

-against-

DAVE ARBOGAST BUICK-GMC, INC.,

Defendant.

:
:
: Civil Action No. 16-cv-00442
: (NRB)
:

: **NOTICE OF MOTION**

: **ORAL ARGUMENT REQUESTED**
:
:

PLEASE TAKE NOTICE, that upon the annexed declaration of Mitchell Ayes, Esq. and the exhibits annexed thereto, the accompanying Memorandum of Law, and upon all pleadings and proceedings had herein, defendant, DAVE ARBOGAST BUICK-GMC, INC., will move this Court, before the Honorable Naomi Reice Buchwald, U.S.D.J. at the Courthouse located at 500 Pearl Street, Courtroom 21A, New York, New York 10007, on a date to be ordered by the Court, for an Order pursuant to F.R.C.P. 12(b)(2), dismissing plaintiff's Complaint, in its entirety, for lack of personal jurisdiction, together with any such other and further relief as the Court deems just and proper, including the costs and disbursements as to this motion and action.

Dated: New York, New York
August 19, 2016

CALLAHAN & FUSCO, LLC
Attorneys for Defendant
DAVE ARBOGAST BUICK-GMC, INC.

BY:



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